

Message

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Sent: 3/11/2019 3:03:42 PM
To: Storrar, Chapin S. [storrarcs@cdmsmith.com]
Subject: FW: Westside Soils Superfund Site--Tis here, no tis there, no tis here after all--It is all over the Place and Needs Clarity and Focus

FYI: Just sharing some of what John is sending. I would like to use this for the context of drafting the Power Point for the Council. Lets make it crystal clear on what we are doing.

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From: John Ray <bodinman2003@yahoo.com>
Sent: Monday, March 11, 2019 4:56 AM
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Subject: Westside Soils Superfund Site--Tis here, no tis there, no tis here after all--It is all over the Place and Needs Clarity and Focus

I appreciate the in depth interview regarding Westside Soils that Nikia provided in the *Montana Standard* on Saturday, March 9th. I have the following observations.

Nikia's comments about extending the RMAP to the Flat were welcomed. When will we know for sure that this will happen? Assuming that the RMAP will be extended, what plans does EPA have to alert the residents of the Flat and, in particular, the Greeley Neighborhood, that this program is available to them. Will there be a comprehensive public education campaign? Anything I might be able to do in this regard, I would be happy to help.

With that said, I still find EPA's position on Westside Soils nebulous, lacking definition and focus. Nikia constantly speaks of what *may* or *might* or *could* happen--that sampling *could be*

in the future; samples *could be* taken in the Greeley, *maybe*; there *might be* sampling of Black Tail Creek but not for quite a while from now; RMAP *may be* extended in some fashion; EPA thinks the mine waste is an ecological risk not a health risk but *doesn't know* for sure; EPA is *fuzzy* as to identifying what is the source of metals in storm water in the Greeley. Thirty-Four years after declaring Butte a Superfund site, EPA doesn't seem to know much about the area in question. And, perhaps more to the point, doesn't seem in a big hurry to find out.

If there is so much that is unknown, shouldn't the EPA thoroughly investigate the area under the rubric of an RI/FS? If there is uncertainty, find out? Public health could be at risk. After all Superfund was created to deal with the **RISK** of exposure to toxics. Superfund was anticipatory.

Also, what is the reason for all the equivocation over the last year or so as to whether or not the area south of Continental Drive was to be included in Westside Soils? The Flat is in, the Flat is out, the Flat is sort of in and sort of out. It makes one's head spin. "Tis here, no tis here, no tis gone." (Paraphrase of lines in Hamlet)

It is obvious to me that the currently, actually planned emphasis of Westside Soils is going to be on the area west and north of BPSOU. The Greeley and the Flat are vague and unclear maybes. But people live there that maybe are being exposed to toxics. Maybe that should motivate EPA to investigate comprehensively and thoroughly. It could be that there is a health issue here. "Ignorance is the root and stem of all evil." (Plato)

I find EPA's reluctance to seriously focus on mine waste that extends south of Continental Drive puzzling. Arsenic contaminated smelter dust *is mine waste* under the definition of mining waste from past mining that EPA has used in Butte. If smelter dust is not mining waste, why is Anaconda being cleaned up? RMAP has said that they have found arsenic contaminated smelter dust in attics south of the Continental Drive. The arsenic in attic dust in Butte is trivalent that comes from the smelter process. There were many smelters in Butte, some near the Greeley. If one but examines the prevailing wind patterns from Anaconda, it is clear how smelter dust from Anaconda could reach Butte, it sure did reach the BPSOU. What mysterious force would stop it at Continental Drive?

It is ludicrous to think that the airborne smelter dust suddenly stops at the boundary of the BPSOU. It is obvious that the focus for the West Side Soils OU will be on mine dumps west and north of BPSOU. The Greeley may be considered at some time in the future, which, given the way Superfund has unfolded in Butte, probably will mean decades from now. Nikia's assertion in the article that "there's no indication there's historic mine waste in Greeley" is counterfactual. For some reason, EPA has been reticent to comprehensively investigate the smelter dust problem south of Continental Drive.

The area south of Continental Drive should be made an "official" part of Westside Soils. I would also ask EPA to articulate in a clear and unambiguous manner a comprehensive plan to investigate the extent of contamination in the area south of Continental Drive, with particular

emphasis on the Greeley Neighborhood. This plan should elucidate a time table, methodology and protocol. In short, the RI/FS should be extended to the area south of Continental Drive, particularly the Greeley Neighborhood.

Unfortunately, I am afraid the Greeley and the Flat are afterthoughts as far as EPA is concerned. As I said, I would still argue that these areas should be part of the Westside Soils OU. I also think the Butte Health Study should look at the Greeley in particular. Also, the Greeley has a marked environmental justice group that needs to be considered.

A lot of what Nikia said in the article and has said in other venues needs to be tied down. *Maybe* that *could* happen in the near future.

Dr. John W. Ray